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Attorneys for SLF Fire Victim Claimants

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re	)	Case No. 19-30088 (DM)
	)	
PG&E CORPORATION,	)	Chapter 11
	)	
and	)	(Lead Case–Jointly Administered)
	)	
PACIFIC GAS AND ELECTRIC	)	
COMPANY	)	<b>NOTICE OF NON-OPPOSITION TO</b>
	)	<b>MOTION FOR RELIEF FROM STAY AND</b>
Debtors	)	<b>ABSTENTION [ECF 1201]</b>

Affects:

☐ PG&E Corporation

☐ Pacific Gas & Electric Company

☒ Both Debtors

\*All papers shall be filed in the Lead Case,  
No. 19-3008 (DM)

Date: April 24, 2019  
Time: 9:30 a.m. (Pacific)  
Ctvm: Hon. Dennis Montali  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

**Opposition Deadline: April 17, 2019, 4 p.m.**

**I.**

## INTRODUCTION

NOTICE IS HEREBY GIVEN that the Singleton Law Firm Fire Victim Claimants (“SLF Claimants”), which consists of over 3,500 individuals who suffered injuries and damages in the 2015, 2017, and 2018 wildfires started by PG&E and who are represented by the Singleton Law Firm, APC,<sup>1</sup> do not oppose the Motion for Relief From the Automatic Stay and Abstention filed by Creditors Marina Gelman and Mikhail Gelman (“Gelman Creditors”). [ECF 1201].

The Gelman Creditors have a discreet issue which does not impact the claims of the thousands of the claimants from the 2015, 2017 and 2018 wildfires caused by PG&E. Accordingly, the result in the Gelman Creditors’ suit, if the suit is allowed to proceed, will not have any precedential effect on the wildfire claims.

Moreover, as the Gelman Creditors correctly point out, their claims involve disputed issues of liability and damages which will need to be resolved at some point in the bankruptcy proceeding. The most efficient way to do so would seem to be to lift the stay for the limited purpose of allowing them to try their case against PG&E in San Francisco Superior Court. The Gelman Creditors have agreed that they will not seek payment on any judgment they obtain in Superior Court outside of the bankruptcy process, so allowing the case to go forward will not limit the funds available for other claimants in the bankruptcy proceeding (assuming PG&E attempts to pay their victims less than the full value of their claims).

Finally, any attempt by PG&E to argue that they lack the ability or resources to litigate a single slip-and-fall case while the bankruptcy proceeding is ongoing lacks merit. PG&E is a multi-billion dollar corporation which not only has a large in-house legal department, but which also

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<sup>1</sup> While there are other firms involved in the representation of the SLF Claimants, because each fire has a different group of firms involved, this group is referred to as the “SLF Claimants” for ease of reference.

1 regularly spends tens of millions per year on outside attorneys. They have the resources to try a  
2 simple slip-and-fall case while dealing with the bankruptcy proceedings.

3 Respectfully submitted,

4 Dated: April 8, 2019

SINGLETON LAW FIRM, APC

5   
6 By: \_\_\_\_\_  
7 Gerald Singleton  
Amanda W. LoCurto

8 Dated: April 8, 2019

SULLIVAN HILL REZ & ENGEL  
A Professional Law Corporation

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10 By: /s/ Christopher V. Hawkins  
11 James P. Hill  
Christopher V. Hawkins

12 Attorneys for the Singleton Law Firm  
13 Fire Victim Claimants  
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